

UNITED STATES DISTRICT COURT

for the

Eastern District of Michigan

United States of America

v.

VALENTINA VULAJ

Case: 2:22-mj-30035

Assigned To : Unassigned

Assign. Date : 1/21/2022

Case No.

Description: RE: SEALED MATTER
(EOB)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of January 1, 2019 through January 31, 2021 in the county of Wayne in the
Eastern District of Michigan, the defendant(s) violated:*Code Section**Offense Description*

18 U.S.C. § 1956

Money Laundering

18 U.S.C. § 1957

Monetary transactions in property of a value of more than
\$10,000 derived from specified unlawful activity

This criminal complaint is based on these facts:

See attached Affidavit

☐ Continued on the attached sheet.Sworn to before me and signed in my presence
and/or by reliable electronic means.Date: January 21, 2022City and state: Detroit, MI


Complainant's signature

Task Force Officer Brian Shook, DEA

Printed name and title



Judge's signature

Hon. David R. Grand, United States Magistrate Judge
Printed name and title

**AFFIDAVIT IN SUPPORT OF
CRIMINAL COMPLAINT**

I, Brian Shock, being first duly sworn, depose and state follows:

INTRODUCTION AND AGENT BACKGROUND

1. I am a duly sworn Task Force Officer (TFO) of the United States Drug Enforcement Administration (DEA) assigned to the Detroit Field Division, Eastern District of Michigan. As such, I am a law enforcement officer of the United States within the meaning of 18 U.S.C. § 2510(7), who is empowered by law to conduct investigations of, to make requests for warrants and to make arrests for offenses enumerated in 18 U.S.C. § 2516(1). I have been a sworn Michigan law enforcement officer for approximately 28 years, am currently a Lieutenant of the Roseville Police Department, and have been employed with the Roseville Police Department for 23 years. Prior to this, I was employed as an officer by the City of Detroit Police Department for approximately 5 years. I am a sworn DEA TFO since March of 2020 and prior to that I was assigned to Roseville Police Department Narcotics Section for 10 years. I have received specialized training in drug trafficking, money laundering, diversion of controlled substances, and investigating drug related crimes, from the Detroit Metropolitan Police Academy, the Macomb County Community College Criminal Justice Institute, the Oakland County Criminal Justice Institute, the Michigan State Police as well as the DEA. During my career, I have performed

undercover assignments portraying roles of both purchaser and dealer of narcotics. Currently, I am assigned to the DEA Financial Investigations Team (FIT) and use all my prior experience and training to investigate any drug trafficking activity involving a money laundering component. I have also participated in multiple Title III investigations involving drug trafficking.

2. I make this affidavit based on personal knowledge derived from my participation in this investigation and information from oral and written reports about this investigation and others that I have received from state and federal law enforcement officers. The information outlined below was provided for the limited purpose of establishing probable cause and does not contain all details or facts of which I am aware relating to this investigation.

3. I am requesting an arrest warrant based on probable cause that VALENTINA VULAJ, date of birth xx/xx/1977, has violated 18 U.S.C. §§ 1956 (money laundering) and 1957 (monetary transactions in property of a value of more than \$10,000 derived from specified unlawful activity).

PROBABLE CAUSE

4. After an investigation by DEA, on June 9, 2021, a federal grand jury in the Eastern District of Michigan charged Leksi Vulaj, also known as Aleksander Vulaj and Aleksander Vuljaj, in a Superseding Indictment (21-cr-20287) for violations of 21 U.S.C. §§ 846 (conspiracy to distribute a controlled substance), 18

U.S.C. § 1956(h) (conspiracy to launder monetary instruments), 18 U.S.C. § 1956(a)(2)(B)(i) (laundering of monetary instruments), and 18 U.S.C. § 1957 (monetary transactions in property of a value of more than \$10,000 derived from specified unlawful activity). Specifically, Leksi Vulaj and his conspirators were charged with the distribution of more than 10 kilograms of cocaine and more than 100 grams of carfentanyl, an opioid analogue of fentanyl, with laundering drug proceeds, with transferring drug proceeds from the United States to bank accounts in the nation of Montenegro. Vulaj was previously convicted in the District of Kansas in 2012 of interstate travel in aid of racketeering, in violation of 18 United States Code § 1952, after he was arrested for driving from Arizona to Kansas to pick up more than a kilogram of methamphetamine. Vulaj was sentenced to 60 months in prison and was deported from the United States to Montenegro in 2016.

5. Valentina VULAJ is the sister of Leksi Vulaj and a resident of Wilmington, North Carolina. Valentina VULAJ was also the registered owner or controller of LV Logistics (the initials of Leksi Vulaj), a company incorporated under the laws of the State of North Carolina.

6. Investigators identified Sophia Martini, also known as Sophia Gjonaj, a resident of Macomb County in the Eastern District of Michigan, as a collector of drug proceeds on behalf of Leksi Vulaj. Martini was arrested in the Eastern District of Michigan via federal complaint on August 31, 2021. Bank records showed that

between at least May 2019 and January 2021, Martini made over 360 deposits of U.S. currency into ATMs at Detroit-area banks, totaling approximately \$737,355. Each of Martini's deposits appeared to be structured; that is, they were below the \$10,000 threshold that would have required the bank to file a currency transaction report. Martini also took steps to mask her transactions by making several deposits into different accounts at the same ATM, and by spreading her deposits out through ATMs at different branches of the same bank in the Detroit area.

7. Of those deposits, Martini made 107 cash deposits into accounts held by Valentina VULAJ and LV Logistics, with 94 of the 107 deposits for amounts between \$900 and \$9,700. Martini made 55 deposits into an account held by Valentina VULAJ at PNC Bank, ending in #2467. Martini made another 14 deposits into Valentina VULAJ's Bank of America account, #9446. Martini also made 8 deposits into an account held by LV Logistics at Bank of America, #3124, and 30 deposits into another LV Logistics' Bank of America account, #7185. In total, Martini deposited over \$290,000 into these accounts, and she was the sole source of deposits during this time period.

8. During this same time period of May 2019 through January 2021, investigators identified more than 25 international wire transfers from bank accounts held by Martini, Valentina VULAJ, and LV Logistics. Bank records show that accounts held by or under Valentina VULAJ or her company, LV Logistics (of

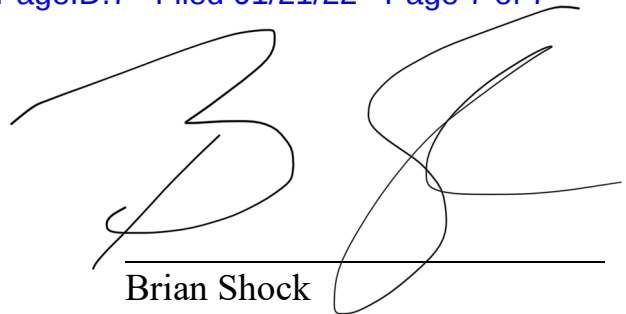
which she is the sole signer), made at least seven wire transfers totaling \$130,000 to accounts held at banks in Montenegro, with the listed recipient or beneficiary of Leski Vulaj:

#	Date	Amount	Sending Acct (last four)
1	Sept. 16, 2020	\$40,000	LV Logistics, Bank of America, Acct #7185
2	Oct 2, 2020	\$15,000	LV Logistics, Bank of America, Acct #7185
3	Oct 2, 2020	\$15,000	LV Logistics, Bank of America, Acct #7185
4	Oct 5, 2020	\$15,000	Valentina VULAJ, PNC, #2467
5	Oct. 5, 2020	\$15,000	Valentina VULAJ, PNC, #2467
6	Oct 16, 2020	\$15,000	Valentina VULAJ, PNC, #2467
7	Oct 16, 2020	\$15,000	Valentina VULAJ, PNC, #2467

9. As noted above, Martini was the sole source of deposits into these accounts and Valentina VULAJ was the sole signer.


CONCLUSION

10. Based on my training and experience and the facts set forth in this affidavit, there is probable cause to believe that between on or about January 1, 2019, through on or about January 31, 2021, Valentina VULAJ, engaged in a conspiracy to launder drug proceeds (18 U.S.C. § 1956) and engaged in monetary transactions over \$10,000 involving illegal drug proceeds (18 U.S.C. § 1957).



Brian Shock
Task Force Officer, DEA

Sworn to before me and signed in my presence
And/or by reliable electronic means.



Hon. David R. Grand
United States Magistrate Judge

January 21, 2022